

Hon. Richard A. Jones
Hon. J Richard Creatura

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

El PAPEL LLC, <i>et al.</i> ,)	
)	
Plaintiffs,)	No. 2:20-cv-01323-RAJ-JRC
)	
vs.)	NOTICE OF PENDENCY OF
)	OTHER ACTION
JAY R INSLEE, <i>et al.</i> ,)	
)	
Defendants)	

Defendant City of Seattle submits this notice under Local Civ. R. 3(h).

Rental Housing Ass’n (“RHA”) v. City of Seattle, No. 20-2-13969-6 SEA, is pending in the Washington State Superior Court for King County in Seattle.

RHA challenges three City of Seattle ordinances: (1) a winter eviction ban; (2) an extension of certain tenant protections; and (3) a rent repayment plan requirement. *RHA* raises claims under only Washington law—it does not implicate federal law.

RHA relates to the action before this Court (*El Papel*) because both challenge the same ordinances providing an extension of certain tenant protections and imposing a rent repayment requirement and both raise contract impairment and takings claims that, although brought under different constitutions, are subject to the same legal analysis. The actions differ in that *RHA* includes claims beyond contract impairment and takings and each action challenges a law or laws the other does not.

1 The City does not believe coordination between the actions would avoid conflicts,
2 conserve resources, or promote an efficient determination of the action.

3 Respectfully submitted October 2, 2020.

4 /s/ Jeffrey S. Weber, WSBA #24496

5 /s/ Roger D. Wynne, WSBA #23399

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